

**Exhibit 4**  
**Declaration of R.M.**

**Declaration of R [REDACTED] M [REDACTED]**

I, R [REDACTED] M [REDACTED] declare as follows:

1. I make this declaration based on my own personal knowledge. If called as a witness, I would testify competently and truthfully to these matters.
2. I am a Plaintiff in this case, *Farmworker Association of Florida, Inc., et al. v. DeSantis, et al.*, 1:23-cv-22655-RKA.
3. I am seventy years old and a U.S. citizen. I am a retired U.S. Army veteran, and I receive a retirement pension for my twenty years of military service. After Operation Desert Storm, I received a Bronze Star for meritorious service in a combat zone. One of my jobs in the military was as a transportation officer. I helped mobilize a battalion for deployment to Saudi Arabia, and subsequently to Iraq and Kuwait, in record time. My wife and I reside in northeast Georgia. We have lived in Georgia continuously since 1991; however, we have resided in Georgia off and on since 1974.
4. I have been a permanent deacon with the Diocese of [REDACTED] Georgia since May [REDACTED]. That year, I was honored to be [REDACTED] who were the first Hispanics in history to be ordained as deacons in the Diocese of [REDACTED]. In the Catholic Church, deacons are ordained ministers who serve the parishioners, the bishop, and priests. To become a deacon, you must be married, and your spouse must write a handwritten letter to the bishop consenting to your request to begin a five-year master's degree program in Arts of Theology and Pastoral Care. The letter is required because the diaconate, the sacrament of orders, takes some time away from home life, and the sacrament of marriage comes first.

5. Even though I am only required to devote four to ten hours a week to my parish, I sometimes would spend upwards of fifty hours a week serving parishioners not just within our parish, but throughout the Southeastern United States. This was a continuation of my personal ministry of service to others that I began long before becoming a deacon. A couple of years into my studies, I was fortunate enough to earn a position as the first paid director of the Hispanic ministry for the Diocese of [REDACTED]
6. I ministered to the Hispanic community at St. [REDACTED] Church in [REDACTED] Georgia, from 2001 to 2016 with the Church; however, I have served the community as a lay minister since 1986. I went to church services at times at [REDACTED] in [REDACTED] South Carolina, as well as at St. [REDACTED] which is located in [REDACTED] in [REDACTED] Georgia.
7. While leading my personal ministry, I developed an emblem that was designed to show inclusiveness and love for all people. My emblem for the Hispanic ministry had an image of the Eucharist in the center with the silhouettes of a diverse group of people walking towards it.
8. When I was studying to become a deacon, one of the nuns told me that I had to discover my own theology. This was an important moment for me. I always thought that theology would be received wisdom, not something you discover on your own. I realized that my theology was based on action and that it was a continuation of what I had already been doing. My theology was based on Catholic social teaching and the corporal works of mercy. I see active solidarity with the marginalized as the key to my ministry.
9. Throughout my life, my ministry has focused on helping the most vulnerable, especially immigrants.

10. I currently attend St. [REDACTED] Catholic Church for worship services, and I formerly served as a deacon at [REDACTED] where I assisted the local priest with the celebration of Mass. I am also the founder of a nonprofit organization in Georgia called [REDACTED] [REDACTED] whose mission is to strengthen families in Hispanic communities here and all over the Americas, the Caribbean, Spain and beyond. I see this as part of my faith and ministry too.
11. Since 1986, when I was still in active service in the Army, I estimate that I have helped over a thousand immigrants and their families with transportation at no cost. Most of the immigrants I assist are undocumented and come from Latin America. The majority of these immigrants entered the United States without having any encounter with immigration authorities, and many have not had any contact with immigration authorities since they entered the United States.
12. In the past ten years, I have spent approximately 40% of my work life and ministry transporting people to church, court, hospitals, schools, lawyers' offices, and to other appointments and events. I have also served as an interpreter and translator when needed.
13. Since becoming a deacon in 2008, I have traveled to Florida approximately forty times in connection with my nonprofit work and ministry. I have transported passengers to several cities in Florida, including Jacksonville, Orlando, Tallahassee, and Tampa.
14. Although I reside in Georgia, I have driven immigrants in my state to required appointments with the United States Citizenship and Immigration Service (USCIS) in Florida. I have also personally transported immigrants into Florida to attend state court proceedings and to request U visa certifications with the help of immigration lawyers.

15. Even though I am currently on sabbatical, I still receive calls from undocumented immigrants who need my assistance with transportation because they do not have driver's licenses. I am willing and able to do so through my nonprofit, even while on sabbatical from my full liturgical duties as a deacon, but SB 1718 means I could be prosecuted for driving an undocumented person across state lines.
16. Because my wife and I live off my pension, it would cause a great financial hardship for my household if I am arrested for violating SB 1718. Being arrested at the age of seventy would also seriously compromise my health. I suffered two strokes in 2015 from which I have not fully recovered, and I had an aneurysm removed in 2014. I do not have the strength that I used to have. I am also the primary breadwinner for my household, which includes my wife, who is also seventy years old and has medical issues of her own. My mother-in-law, who is eighty-nine years old, also lives with me, and she is dependent on me for transportation to doctor's appointments and other needs.
17. The transportation provisions of SB1718 are stopping me from doing an important part of my ministry. Mixed-status families that I assist in Georgia and Florida will be unable to attend required appointments and sort out their immigration cases. These provisions are cruel and harmful and interfere with my ministry, my faith, and my moral principles.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed in [REDACTED] Georgia on August 5, 2023. [REDACTED]